



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

July 13, 2021

BY EMAIL

Honorable Gabriel W. Gorenstein
United States Magistrate Judge
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Niloufar Bahadorifar et al.,*
21 Cr. 430 (RA)**

Dear Judge Gorenstein:

On July 8, 2021, a superseding indictment, S1 21 Cr. 430 (RA) (the “Superseding Indictment”), was returned in the above-captioned matter and filed under seal, together with warrants for the arrests of the charged defendants. The Government respectfully requests that the Superseding Indictment and warrants be unsealed. This request is made to this Court because the assigned District Judge is presently unavailable.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

SO ORDERED:

GABRIEL W. GORENSTEIN,
U.S.M.J.

By:

Michael D. Lockard / Matthew J.C. Hellman
/ Jacob H. Gutwillig
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